

From: Arcaya, Alyssa [mailto:arcaya.alyssa@epa.gov]

Sent: Friday, February 12, 2016 11:31 AM

To: Tang, Koon S (DEC); Baker, Brian (DEC)

Cc: dec.sm.DEPPermitting; Jackson, Wayne; Obrien, Karen

Subject: Proposed administrative renewal of NY0107069 (Lockwood Ash Disposal Landfill)

Hello Koon and Brian,

I'm writing with regards to the proposed administrative renewal of NY0107069 (the Lockwood Ash Disposal Landfill), which was public noticed on the ENB on January 13th. The EPA does not support administrative renewal of this permit for a variety of reasons. We were alerted to the proposed rollover of this permit by concerned members of the local community, who also expressed concerns about violations at the site and planned changes at the associated Greenidge power plant, which has disposed of coal ash at the landfill. We are aware of the Consent Decree requiring a schedule of treatment for the landfill leachate.

We believe the Lockwood Ash disposal site may be subject to the new Effluent Limitation Guideline for the Steam Electric Generating Point Source Category, which establishes new effluent limitations for coal ash landfills and surface impoundments, or coal ash pond overflows.

For these reasons, this facility should be placed on the No Administrative Renewal List by the requirements of NY TOGS 1.2.2 (pp. 21-22, Permit Processing Procedures Section IV: No Administrative Renewal List).

Please let me know if you would like to discuss.

Thanks,

Alyssa

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